

REMARKS

Applicant respectfully requests consideration and allowance of the elected claims. Claims 1-88 were originally filed. Claims 1-52 have been previously canceled as being directed to non-elected claims. Independent claims 53, 74, 87 and 88 are amended. Claims 53-85 and 87-88 remain pending. Applicant thanks the Examiner for the detailed analysis presented in the Office Action of March 28, 2007.

Applicant Provided Interview Summary

The Applicant appreciates that the Examiner Mike Opsasnick allocated time to speak to the Applicant's representative on June 19, 2007. The interview of June 19, 2007 was conducted over the telephone.

During the telephone interview on the aforementioned date, the rejection of the independent claims 53, 74, 87 and 88 was discussed. The discussion focused on the Applicant's position that the combination of patents relied upon (Miike, Sugimura, and Komatsu) does not disclose or suggest "an output text, converted from the input text, wherein the output text replaces the input text from which the output text was converted as each portion of the input text is converted, *the output text displayed together with unconverted input text within the line-based entry area in at least one continuous string of text, the at least one continuous string of text composed of the output text and the unconverted input text.*" (See claim 53; emphasis added.) The other independent claims recite similar subject matter.

The Examiner agreed that he would carefully reconsider the art grounds rejection of Record upon receiving this Response and reviewing the claims as amended. If the reconsideration indicates that the art grounds rejection of Record

is unsustainable, the Applicant understands that the Examiner may need to conduct an updated search before determining the Allowability of the instant Application.

Claim Rejections Under 35 U.S.C. § 101

Claims 53, 87 and 88 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicant respectfully traverses the rejection.

Claim 53 has been amended to recite "a line-based entry area to display on a display device associated with a computer system." The language added to the rejected claim provides functional interrelationship between computer program related limitations and a computer system. Accordingly, the Office is respectfully requested to withdraw the rejection.

Claims 87 and 88 have been amended to recite " One or more computer-recordable media storing computer-executable instructions that, when executed on a processor, cause a computer to..." (Emphasis added.) The language added to the rejected claims is Office accepted as being sufficient for overcoming non-statutory subject matter rejections of the type asserted by the Office. Accordingly, the Office is respectfully requested to withdraw the rejection.

Claim Rejections Under § 103

Claims 53-63, 65-70, 72-80, 82-85, 87 and 88 stand rejected as being unpatentable under 35 U.S.C. § 103(a) in view of U.S. Patent No. 5,214,583 to Miike et al. ("Miike") in view of U.S. Patent No. 5,987,403 to Sugimura ("Sugimura"), and in further view of U.S. Patent No. 5,732,276 to Komatsu et al. ("Komatsu"). Each of the independent claims 53, 74, 87 and 88 are rejected with this rejection. **Claims 64, 71 and 81** stand rejected as being unpatentable under 35 U.S.C. § 103(a) in view of Miike, Sugimura and Komatsu, and further in view of U.S. Patent No. 5,974,413 to Beauregard et al. ("Beauregard"). Applicant respectfully traverses these rejections.

Applicant addresses the rejection of the independent claims in the following. As a preliminary matter, Applicant does not separately address the patentability of each remaining dependent claim in detail. However, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the Examiner's conclusion that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment made by the Examiner, should not be considered as an admission that Applicant concurs with the Examiner's interpretation and assertions regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

Independent claim 53 recites:

A language input user interface comprising:
a line-based entry area to display on a display device associated with a computer system;
an input text displayed within the line-based entry area; and
an output text, converted from the input text, wherein the output text replaces the input text from which the output text was converted as each portion of the input text is converted, the output text displayed together with unconverted input text within the line-based entry area in at least one continuous string of text, the at least one continuous string of text composed of the output text and the unconverted input text. (Emphasis added.)

Respectfully, none of the references, alone or in combination, discloses or suggests what is recited by claims 53, 74, 87, and 88 for at least the following reasons.

Foremost, none of the patents relied upon show output text presented in a continuous string of text with unconverted input text. The immediate following discussion is confined to the references Miike and Sugimura, as Komatsu was relied upon as allegedly disclosing "output text replaces the input text from which the output text was converted as each portion of the input text is converted." Therefore, the deficiencies of Komatsu will follow the discussion of Miike and Sugimura.

In Miike, FIGURES 7-17 illustrate an interface where nontranslated text appears in a first field on one side of a display, whereas translated text appears in a separate, second field on an opposite side of the display. Further, in FIGURES 6, 7, and 17 of Sugimura cited in the Office Action, output text similarly is not presented in a continuous string of text with unconverted text input. In FIGURES 6 and 17, the unconverted text is presented on a separate line from the converted text. In FIGURE 7, as in the case of FIGURES 7-17 of Miike, converted text

appears in a field on an opposite side of a display from the unconverted text. Thus, Applicant submits that neither reference, alone or in combination, discloses or suggests what is recited in Claim 53. The Applicant further elaborates in the following.

The current Office Action indicates that Miike is not clear as to the "proximity of the two texts," including the original text and the translated text (Office Action, Page 3, Section 5, Paragraph 3). Respectfully, the Office Action's acknowledgement that the two texts are, at best, proximate, concedes that the input text and output text are not presented in a "continuous string of text," as recited in claim 53. Moreover, Applicants submit that FIGURES 7-16 of Miike illustrate an interface where nontranslated text appears in a first field on a different side of a display than the translated text, which is presented in a separate, second field on an *opposite side* of the display. (Discussed hereinabove.) Thus, by disclosing maintaining separate areas for presentation of nontranslated and translated text, in itself, Miike teaches away from the recitation of claim 53 of "output text, converted from the input text . . . displayed with unconverted input text . . . in at least one continuous string of text."

Conceding that Miike fails to disclose this limitation of claim 53, the Office Action is mistaken that Sugimura remedies the shortcomings of Miike in disclosing the display of output text and input text in a continuous string. Because Miike shows separate display of the nontranslated text and the translated text, one would not combine such a reference with a reference that taught an inapposite, countervailing presentation of the input and output text. Furthermore, even if such an illogical combination were to be made, Sugimura fails to disclose displaying "target and source data together" as asserted by the Office Action. FIGURES 7,

13, and 17 relied upon by the Office Action concern the preparation of the "**Target Display Data** using the Display Properties of the Source Display Data" and a "Number of Characters of the **Target Language**" (FIGURE 13, Block S53). However, although the target display data is prepared with regard to properties of the source display data, there is nothing in the figures relied upon or the accompanying text that shows the target display data and the source display data displayed together in a continuous string. Furthermore, FIGURE 6 of Sugimura plainly shows the nontranslated text and the translated text being displayed separately, in different strings of text. Thus, a combination of Miike and Sugimura fails to disclose or suggest what is recited in claim 53.

In response to the Applicant's Pre-Appeal Document, the Office argues that the each of the "string numbers" 1-6 illustrated in FIGURE 7 of the Sugimura shows that the patent discloses "a single string association with the source and target language." According to Sugimura, the use of these string numbers is merely for the readability of the patent. That is, Sugimura discloses, coupled with the discussion of FIGURE 7, that the "P seen in the target language line 2 and line (hereafter "string") 4 in FIG. 7." Here, Sugimura is merely referring to a line number designation in the table illustrated by FIGURE 7 and indicates that "line" will be later referred to as "string." Certainly, Sugimura does not disclose or suggest that these string numbers are a sequence of symbols or digits, as those skilled in computer programming understand. This finding is further evidenced in Sugimura based on where target and source data are stored in the Sugimura system. According to the patent, target data is stored in a target memory unit 5 and the source data is stored in the source data memory unit 2. The relied upon patent does not disclose or suggest that the two data types, which are stored in

disparate memory locations, are ever combined as a continuous string and displayed on a display device. Therefore, the Applicant continues to maintain that Sugimura does not remedy that which is not disclosed by Miike.

The Office also points to FIGURE 16 to show that target data and source data are displayed as a continuous string of text. In particular, the Office points to step S92 in the figure. Step S92 states that the target display data is combined with "a special symbol." According to Sugimura, such a special symbol is used to show "the display properties is inserted at the end of the corresponding word." (See column 10, lines 13-20.) Here the Sugimura is referring to the inserting a special symbol at the end of the target display data that corresponds to some formatting associated with the source data. Sugimura is not suggesting that the target display data is displayed as a continuous string that includes the source data. Again, the foregoing is further evidence that Sugimura does not remedy that which is not disclosed by Miike.

In addition, neither Miike nor Sugimura show output text replacing the input text as each portion of the input text is converted. In fact, both Miike and Sugimura are directed to presenting the unconverted text and the converted text side by side for comparison, a point that is emphasized by the display of the unconverted text and converted text in different parts of the display. In FIGURES 7 and 17 of Miike, the unconverted text is displayed in a field on a left column of the display while the converted text is displayed in a right column of the display. Similarly, in FIGURES 6, 7, and 17 of Sugimura, the unconverted text appears on a first line or in a field on a left side of the display, while the converted text appears on a separate, second line or in a field on a right side of the display. The

converted and unconverted text **both** are correlated and displayed, and in neither reference does the unconverted text replace the converted text on the display.

In fact, it is an object of both the cited references to maintain the unconverted and converted text, rather than replace the unconverted text. The interface of Miike, as shown in FIGURE 3, includes an original display region and a translation display region in which neither text replaces the other. Moreover, studying the flow diagram of FIGURE 4 of Miike, original text is displayed at S9, while translated text is displayed at S7, and there is no provision for translated text to replace the original, nontranslated text. It is noted that, while the interface of FIGURE 3 also illustrates an edit region, the edit region includes only translated text. Thus, as summarized by Miike:

"Therefore, the operator can interactively obtain a translated text while inputting original text and performing edit processing of the **corresponding translated text.**"

(*See* Miike, Column 5, Lines 52-55; emphasis added).

In Sugimura, both the figures and the text make clear that it is an object of Sugimura **not** to replace original, nontranslated text with translated text, but to maintain the original and translated text in pairs to illustrate the correspondence of the original words to the translated words:

"The above object can be achieved by a document conversion apparatus for converting source data into target data which includes a source text memory unit for storing a source text; a source display data memory unit for **storing a source display data, wherein the source display data is a combination of source display properties included in the source text and a location in which source display properties are attached to the source text**; a conversion unit for converting a source text body into a target text body, the source text body being text in which source display properties are excluded, the target text also being text in which display properties are excluded; **a target text memory unit for storing the converted target text body; conversion paired information memory unit for storing conversion paired information, wherein the conversion paired information is a**

combination showing how the words in the source text correspond to the words in target text, wherein word is defined as a unit with meaning; a process unit for processing the target text body and preparing a target display data by searching the source display data and the conversion paired information, wherein the ***target display data is data showing target display properties to be attached and a location in the target text body to which should be attached target display properties corresponding to the source display properties***; a target text preparation unit for preparing a target text by attaching the display properties to the target text body stored in the target text memory unit, the attaching carried out by conforming to the contents of the target display data obtained from the process unit; and a display unit for displaying the prepared target text."

(Sugimura, Column 2, Lines 15-44; emphasis added). Thus, Sugimura not only shows, but is directed to, showing both original and translated text, not replacing the original text with the translated text.

In fact, Applicant submits that both Miike and Sugimura teach away from what is recited in claim 53. Because both the cited references maintain both the original and translated text, where nontranslated text is not displayed in a line based entry area in at least one continuous string of text wherein translated text replaces the original text, Applicant respectfully submits that the references teach away from the invention recited in claim 53.

Similarly, the combination of Miike and Sugimura fails to disclose or suggest what is recited in claims 74, 87, and 88. Claim 74 recites "the user interface being configured to display the converted output text in-line with unconverted input text in at least one continuous string of text, the at least one continuous string of text to be composed of the converted output text and the unconverted input text." Claim 87 recites displaying "display the language text and unconverted phonetic text in-line together in at least one continuous string of text within a line-based entry area, the at least one continuous string of text

composed of the language text and the unconverted phonetic text." Claim 88 recites displaying "display the language text, non-phonetic text, and unconverted phonetic text in-line together in at least one continuous string of text within a line-based entry area, the at least one continuous string of text composed of the language text, the non-phonetic text, and the unconverted phonetic text." For the reasons described with regard to claim 53, the references relied upon by the Office Action fail to disclose or suggest these limitations, and thus fail to render unpatentable claims 74, 87, and 88.

The Office Action incorrectly asserts Komatsu overcomes at least one shortcoming of other cited references in disclosing that "output text replaces the input text from which the output text was converted as each portion of the input text is converted" as recited by claim 53. Applicants wish to note that the Office Action acknowledges that Komatsu "teaches displaying the translation of the input text at *certain stages* of translation" (Office Action, Page 4, Paragraph 2; emphasis added). However, suggesting that the display of stages of the translation is the same as replacing input text with output text as it is converted is misleading; the stages referenced by Komatsu do not refer to portions of text being converted, but to different phases of the translation of complete strings of text.

The text of Komatsu relied upon by the Office Action at Column 4, Line 64, through Column 5, Line 25, describes how FIGURES 2(a)-2(d) depict entirely different stages of the translation of a Japanese phrase that means "The President flew to France." The stages displayable include an "inputted text buffer 2, morphological analysis of [the] *completed* text buffer 5, translation equivalent conferred text buffer 7 in which equivalents have been conferred to content words, and structure conversion completed text buffer 9 for which conversion of sentence

structure to that of the target language has been completed" (Komatsu, Column 4, Lines 8-15; emphasis added). As evidenced by Komatsu, the different stages of the translation are displayable *after* the "**completed text buffer**" includes the whole phrase or sentence to be translated. Moreover, the stages displayable are not segments of that phrase or sentence, but include different steps within the translation of that complete phrase or sentence. Thus, Komatsu does not show that "the output text replaces the input text from which the output test was converted as each portion of the input text is converted" as recited by claim 53, and therefore, fails to overcome the admitted shortcomings of the other cited references that the Office Action alleges render claim 53 unpatentable.

Komatsu similarly fails to make up for the shortcomings of the references applied to claims 74, 87, and 88. Komatsu fails to disclose or suggest "the output text is substituted for the input text from which the output text was converted as each portion of the input text is converted" as recited by claim 74. Similarly, Komatsu also fails to each or suggest "the language text replaces the phonetic text from which the language text was converted as each portion of the phonetic text is converted" as recited by claims 87 and 88. Thus, for the reasons described with regard to claim 53, the references cited fail to disclose or suggest these limitations, and thus fail to render claims 74, 87, and 88 unpatentable.

In accordance with the above, Applicant submits that neither Miike, Sugimura, nor Komatsu alone or in combination, disclose nor suggest what is recited by claim 53. Thus, claim 53 is patentable over the cited references. Furthermore, because claims 54-73 are patentable for at least the same reasons as the independent claim from which they depend, and because they add additional features to claim 53, Applicant submits that claims 54-73 also are patentable.

Applicant requests that the rejection under 35 U.S.C. § 103 be withdrawn against claims 53-73.

For the reasons already discussed with respect to claims 53-73, Applicant also asserts that claims 74-85 and 87-88 also are patentable over the cited references. Furthermore, because claims 75-85 are patentable for at least the same reasons as the independent claim from which they depend, and because they add additional features to claim 74, Applicant submits that claims 75-85 also are patentable. Thus, Applicant requests that the rejection under 35 U.S.C. § 103 also be withdrawn against claims 74-85 and 87-88.

Claims 64, 71 and 81 stand rejected as being unpatentable under 35 U.S.C. § 103(a) in view of Miike, Sugimura, Komatsu, and further in view of U.S. Patent No. 5,974,413 to Beauregard et al. ("Beauregard"). This rejection is respectfully traversed.

Each of the rejected claims is dependent upon one of the above-discussed independent claims. Because claims 64, 71 and 81 are patentable for at least the same reasons as the independent claim from which they depend, and because they add additional features to claim 74, Applicant submits that claims 75-85 also are patentable. Moreover, a detailed review of Beauregard shows the disclosure therein does not remedy the deficiencies of the Miike, Sugimura, Komatsu, as discussed hereinabove. Thus, Applicant requests that the rejection under 35 U.S.C. § 103 also be withdrawn against claims 64, 71 and 81.

Conclusion

In accordance with the foregoing remarks, Applicant believes that the pending claims are allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the Applicant at the telephone number provided below.

Respectfully Submitted,

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